

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re: BAYOU STEEL BD HOLDINGS, LLC, <i>et al.</i> , ¹ Debtors.	Chapter 7 Case No. 19-12153 (KBO) (Jointly Administered)
GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> , Plaintiff, vs. TMS INTERNATIONAL, LLC, Defendant.	Adv. Proc. No. 21-50233 (KBO)

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Bayou Steel BD Holdings, L.L.C., *et al.*, (the “**Plaintiff**”), for the estates of the above-captioned debtors (the “**Debtors**”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “**Bankruptcy Code**”), by and through his undersigned counsel and defendant TMS International, LLC (the “**Defendant**,” and together with Plaintiff, the “**Parties**”), enter into this *Stipulation for Extension of Time for the Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “**Stipulation**”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which the Defendant may answer, move, or otherwise plead in response to the *Complaint* [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including May 2, 2021.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

2. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

Dated: March 25, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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